

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

CYNTHIA SEMBACH,

Plaintiff,

v.

LAKEVIEW LOAN SERVICING, LLC AND  
M&T BANK CORPORATION; AND  
SAFEGUARD PROPERTIES MANAGEMENT,  
LLC

Defendants.

Case No. 1:20-CV-00752

Hon. Andrea M. Wood

**DEFENDANTS' UNOPPOSED MOTION FOR EXTENSION OF TIME TO RESPOND  
TO PLAINTIFF'S DISCOVERY REQUESTS**

Defendant M&T Bank ("M&T") and Lakeview Loan Servicing, LLC ("Lakeview") (Collectively, "Defendants"), by and through their undersigned counsel, hereby move this Court for an extension the time to respond to Plaintiff's Requests to Admit, Interrogatories, and Requests for Production (collectively, the "Discovery Requests") of Plaintiff Cynthia Sembach's ("Plaintiff") by 30 days, up to and including January 27, 2021. In support of this Motion, Defendants state as follows:

1. On February 10, 2020, M&T was served with the Complaint and the answer or other responsive pleading is currently due by March 2, 2020 (ECF No. 1).
2. On April 22, 2020, Defendants filed a Motion to Dismiss the Complaint (ECF No. 21).
3. On June 10, 2020, Plaintiff filed the instant First Amended Complaint (ECF No. 31).
4. On November 27, 2020, Plaintiff served the Discovery Requests on Defendants.
5. Plaintiff's Discovery Requests to M&T consist of 25 Interrogatories, 63 Requests to Admit, and 28 Requests to Produce.

6. Plaintiff's Discovery Requests to Lakeview consist of 25 Interrogatories, 69 Requests to Admit, and 58 Requests to Produce.
7. On December 8, 2020, Defendants filed a Motion to Stay Discovery based on the pending Motions to Dismiss the First Amended Complaint filed by Defendants and co-defendant Safeguard Properties Management, LLC ("Safeguard").
8. Per the Federal Rules of Civil Procedure, Defendants' responses to Plaintiff's outstanding Discovery Requests is December 28, 2020.
9. Given the voluminous requests given to Defendants by Plaintiff, Defendants request additional time of 30 days to respond to Plaintiff's outstanding discovery
10. Counsel for Defendants contacted counsel for Plaintiff on December 21, 2020, at which point counsel for Plaintiff did not object to Defendants' request for an extension of time.
11. This motion is not made for delay, but only to permit orderly resolution of issues in the case.

WHEREFORE, Defendants M&T Bank and Lakeview Loan Servicing, LLC respectfully request that the Court extend the time to respond to Plaintiff's outstanding Discovery Requests for 30 days, through January 27, 2021, and for such other relief this Court finds just and equitable.

Dated: December 21, 2020

Respectfully submitted,

**M&T Bank and Lakeview Loan Servicing, LLC**

By: /s/ Punit K. Marwaha  
Punit K. Marwaha, Esq.  
TROUTMAN PEPPER HAMILTON SANDERS  
LLP  
227 West Monroe Street, Suite 3900  
Chicago, IL 60606  
Phone: (312) 759-5949  
punit.marwaha@troutman.com  
*Attorney for Defendants*

**CERTIFICATE OF SERVICE**

I hereby certify that this motion was electronically filed with the Clerk using the CM/ECF system, which will send a notice of electronic filing to all registered users of the CM/ECF system.

Dated: December 21, 2020

/s/ Punit K. Marwaha  
Punit K. Marwaha